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Attorneys for Plaintiffs,
GLEN E. FRIEDMAN

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

GLEN E. FRIEDMAN) Case No. CV10-0014 DDP (JCx)

Plaintiffs,) Complaint Filed: January 4, 2010

V

) ANSWER OF COUNTER-
GUETTA a/k/a MR.) DEFENDANT GLEN E. FRIEDMAN
SH; and DOES 1 though) TO DEFENDANT'S COUNTER-
e,) CLAIM FOR DECLARATORY
) RELIEF AND ATTORNEYS' FEES

Defendants.

ANSWER

Defendant GLEN E. FRIEDMAN (“Friedman”) answers the Counterclaim (hereinafter “Counterclaim”) filed by THIERRY GUETTA a/k/a MR. BRAINWASH (“Guetta”), as follows:

1. In Answer to Paragraph 1 of the Counterclaim, Friedman admits the allegations of this paragraph.

2. In Answer to Paragraph 2 of the Counterclaim, Friedman admits the allegations of this paragraph.

3. In Answer to Paragraph 3 of the Counterclaim, Friedman admits that Guetta is an individual who can be located within this judicial district.

4. In Answer to Paragraph 4 of the Counterclaim, Friedman admits that he is an individual who is a citizen of the State of New York.

COUNTER CLAIM ONE

(Declaration of Non-Infringement of Copyright against all Counter-Defendants)

5. In Answer to Paragraph 5 of the Counterclaim, no response is required to this allegation.

6. In Answer to Paragraph 6 of the Counterclaim, Plaintiff admits the allegations in this paragraph.

7. In Answer to Paragraph 7 of the Counterclaim, Plaintiff admits the allegations in this paragraph.

8. In Answer to Paragraph 8 of the Counterclaim, Plaintiff denies this allegation.

9. In Answer to Paragraph 9 of the Counterclaim, Plaintiff admits this allegation.

COUNTERCLAIM TWO

(Costs and Attorney's Fees under 17 U.S.C. §505 against Counter-Defendant)

1 10. In Answer to Paragraph 10 of the Counterclaim, no response is required to
2 this allegation.
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4 11. In Answer to Paragraph 11 of the Counterclaim, Plaintiff admits this
5 allegation.
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7 12. In Answer to Paragraph 12 of the Counterclaim, Plaintiff denies this
8 allegation.
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10 13. In Answer to Paragraph 13 of the Counterclaim, Plaintiff denies this
11 allegation.
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PRAYER

13 In answer to Counter Claimant's prayer, Counter-Defendant denies that Counter-
14 Claimant was damaged and denies Counter-Claimant is entitled to any form of relief.
15

AFFIRMATIVE DEFENSES

16 Counter-Defendant sets forth below its affirmative defenses. By setting forth
17 these affirmative defenses, Counter-Defendant does not assume the burden of proving
18 any fact, issue or element of any claim for relief, where such burden properly belongs to
19 Counter-Claimant. Moreover, nothing stated herein is intended or shall be construed as
20 an acknowledgment that any particular issue or subject matter necessarily is relevant to
21 Counter-Claimant's allegations.
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First Affirmative Defense

(Failure To State A Claim)

1. The Counterclaim fails to state facts sufficient to constitute a claim for relief against Counter-Defendant.

Second Affirmative Defense

(Set-Off)

2. Counter-Defendant is entitled to a set-off, should any damages be awarded against it, of any amounts owed by Counter-Claimant to Counter-Defendant.

Third Affirmative Defense

(Additional Defenses)

3. Counter-Defendant hereby gives notice that it intends to rely upon any other defenses that may become available or appear during the discovery proceedings in this case and hereby reserve its right to amend this answer to assert any such defenses.

Dated: March 18, 2010

THE LINDE LAW FIRM

By: __/s/Erica L. Allen _____

Douglas A. Linde

Erica L. Allen

Attorneys for Plaintiff/Counter-Defendant

GLEN E. FRIEDMAN

DEMAND FOR JURY TRIAL

Counter-Defendant hereby demands a trial by jury in this action pursuant to F.R.C.P. 38 and the Seventh Amendment of the Constitution.

Dated: March 18, 2010

THE LINDE LAW FIRM

By: __/s/Erica L. Allen _____
Douglas A. Linde
Erica L. Allen
Attorneys for Plaintiff/Counter-Defendant
GLEN E. FRIEDMAN